

Date of Presentment: April 13, 2023 at 10:00 a.m. (prevailing Eastern Time)  
Objection Deadline: April 10, 2023 at 4:00 p.m. (prevailing Eastern Time)

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*Counsel to the Petitioning Creditors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

TV Azteca, S.A.B. de C.V., *et al.*,<sup>1</sup>

Alleged Debtors.

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)  
) Chapter 11  
)

) Case No. 23-10385  
)

) (Joint Administration Requested)  
)  
)

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<sup>1</sup> The Debtors in these cases are TV Azteca, S.A.B. de C.V.; Alta Empresa, S.A. de C.V.; Asesoría Especializada En Aviación, S.A. de C.V.; Equipo de Futbol Mazatlan, S.A. de C.V.; Producciones Dopamina, S.A. de C.V.; Azteca Records, S.A. de C.V.; Ganador Azteca, S.A.P.I. de C.V.; Operadora Mexicana De Televisión, S.A. de C.V.; Azteca Sports Rights LLC; Producciones Azteca Digital, S.A. de C.V.; Producciones Especializadas, S.A. de C.V.; Productora De Televisión Regional De Tv Azteca, S.A. de C.V.; Promotora de Futbol Rojinegros, S.A. de C.V.; Mazatlan Promotora de Futbol, S.A. de C.V.; Publicidad Especializada en Medios de Comunicación de TV Azteca, S.A. de C.V.; S.C.I. de México, S.A. de C.V.; Servicios Aéreos Noticiosos, S.A. de C.V.; Servicios Especializados Taz, S.A. de C.V.; Servicios y Mantenimiento del Futuro en Televisión, S.A. de C.V.; Corporación de Asesoría Técnica y de Producción, S.A. de C.V.; Editorial Mandarina, S.A. de C.V.; Multimedia, Espectáculos y Atracciones, S.A. de C.V.; Servicios Foráneos de Administración, S.A. de C.V.; Servicios Locales De Producción, S.A. de C.V.; Azteca International Corporation; Stations Group, LLC; TV Azteca Honduras, S.A. de C.V.; Comercializadora de Televisión de Honduras, S.A. de C.V.; Incotel S.A.; TVA Guatemala S.A.; Lasimex, S.A. de C.V.; TV Azteca Global, S.L.U.; Azteca Comunicaciones Perú, S.A.C.; Redes Opticas, S.A.C.; Televisora del Valle de México, S.A. de C.V. The location of the Debtors' corporate headquarters is Periférico Sur 4121, colonia Fuentes del Pedregal, alcaldía Tlalpan, C.P. 14140, Ciudad de México, México.

**NOTICE OF PRESENTMENT OF THE  
PETITIONING CREDITORS' MOTION FOR ENTRY OF  
AN ORDER (I) DIRECTING JOINT ADMINISTRATION OF  
CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that on March 27, 2023, the petitioning creditors (the "Petitioning Creditors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases") filed the attached *Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* (the "Motion").

**PLEASE TAKE FURTHER NOTICE** that the undersigned will present the proposed order attached as **Exhibit A** to the Motion (the "Proposed Order") to the Honorable Lisa G. Beckerman, United States Bankruptcy Judge (the "Court") for signature on **April 13, 2023, at 10:00 a.m., prevailing Eastern Time.**

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Motion must (a) be made in writing; (b) comply with the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, the Court's Chambers Rules and any other applicable case management rules and orders; (c) state the name and address of the objecting party; (d) state with particularity the legal and factual basis for such objection; (e) be filed with the Court not later than **April 10, 2023 at 4:00 p.m. prevailing Eastern Time** (the "Objection Deadline"); and (f) be promptly served on the following parties: (a) the Debtors; (b) counsel to the Debtors; (c) the Petitioning Creditors, (d) the Office of the United States Trustee for the Southern District of New York; (e) the Internal Revenue Service; and (f) any party that has requested notice pursuant to Bankruptcy Rule 2002.

**PLEASE TAKE FURTHER NOTICE** that if no objection is filed by the Objection Deadline, the Proposed Order may be signed without further notice or a hearing.

**PLEASE TAKE FURTHER NOTICE** that if an objection is filed by the Objection Deadline, a hearing will be held to consider the Motion on a date and time to be determined by the Court.

Dated: March 27, 2023  
New York, New York

**AKIN GUMP STRAUSS HAUER & FELD LLP**

By: /s/ Michael S. Stamer

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*Counsel to the Petitioning Creditors*

Date of Presentment: April 13, 2023 at 10:00 a.m. (Prevailing Eastern Time)  
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*Counsel to the Petitioning Creditors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

_____	)	Chapter 11
In re:	)	
TV AZTECA, S.A.B. DE C.V.,	)	Case No. 23-10385 (LGB)
	)	
Alleged Debtor.	)	
_____	)	
In re:	)	Chapter 11
ALTA EMPRESA, S.A. DE C.V.,	)	Case No. 23-10386 (LGB)
	)	
Alleged Debtor.	)	
_____	)	
In re:	)	Chapter 11
ASESORÍA ESPECIALIZADA EN	)	Case No. 23-10387 (LGB)
AVIACIÓN, S.A. DE C.V.,	)	
	)	
Alleged Debtor.	)	
_____	)	

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In re:	)	Chapter 11
	)	
EQUIPO DE FUTBOL MAZATLAN, S.A. DE	)	Case No. 23-10388 (LGB)
C.V.,	)	
	)	
Alleged Debtor.	)	
	)	

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In re:	)	Chapter 11
	)	
PRODUCCIONES DOPAMINA, S.A. DE	)	Case No. 23-10389 (LGB)
C.V.;	)	
	)	
Alleged Debtor.	)	
	)	

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In re:	)	Chapter 11
	)	
AZTECA RECORDS, S.A. DE C.V.,	)	Case No. 23-10390 (LGB)
	)	
Alleged Debtor.	)	
	)	
	)	

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In re:	)	Chapter 11
	)	
GANADOR AZTECA, S.A.P.I. DE C.V.,	)	Case No. 23-10391 (LGB)
	)	
Alleged Debtor.	)	
	)	
	)	

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In re:	)	Chapter 11
	)	
OPERADORA MEXICANA DE	)	Case No. 23-10393 (LGB)
TELEVISIÓN, S.A. DE C.V.,	)	
	)	
Alleged Debtor.	)	
	)	

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In re:	)	Chapter 11
	)	
AZTECA SPORTS RIGHTS LLC,	)	Case No. 23-10395 (LGB)
	)	
Alleged Debtor.	)	
	)	
	)	
	)	

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In re:	)	Chapter 11
	)	
PRODUCCIONES AZTECA DIGITAL, S.A.	)	Case No. 23-10397 (LGB)
DE C.V.;	)	
	)	
Alleged Debtor.	)	
	)	
	)	

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In re:	)	Chapter 11
	)	
PRODUCCIONES ESPECIALIZADAS, S.A.	)	Case No. 23-10399 (LGB)
DE C.V.,	)	
	)	
Alleged Debtor.	)	
	)	
	)	

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In re:	)	Chapter 11
	)	
PRODUCTORA DE TELEVISIÓN	)	Case No. 23-10400 (LGB)
REGIONAL DE TV AZTECA, S.A. DE C.V.,	)	
	)	
Alleged Debtor.	)	
	)	
	)	

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In re:	)	Chapter 11
	)	
PROMOTORA DE FUTBOL ROJINEGROS,	)	Case No. 23-10402 (LGB)
S.A. DE C.V.,	)	
	)	
Alleged Debtor.	)	
	)	
	)	

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In re:	)	Chapter 11
	)	
MAZATLAN PROMOTORA DE FUTBOL,	)	Case No. 23-10404 (LGB)
S.A. DE C.V.,	)	
	)	
Alleged Debtor.	)	
	)	
	)	

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In re:	)	Chapter 11
	)	
PUBLICIDAD ESPECIALIZADA EN	)	Case No. 23-10405 (LGB)
MEDIOS DE COMUNICACIÓN DE TV	)	
AZTECA, S.A. DE C.V.,	)	
	)	
Alleged Debtor.	)	
	)	
	)	
In re:	)	Chapter 11
	)	
S.C.I. DE MÉXICO, S.A. DE C.V.,	)	Case No. 23-10407 (LGB)
	)	
Alleged Debtor.	)	
	)	
	)	
	)	
In re:	)	Chapter 11
	)	
SERVICIOS AÉREOS NOTICIOSOS, S.A.	)	Case No. 23-10408 (LGB)
DE C.V.,	)	
	)	
Alleged Debtor.	)	
	)	
	)	
In re:	)	Chapter 11
	)	
SERVICIOS ESPECIALIZADOS TAZ, S.A.	)	Case No. 23-10419 (LGB)
DE C.V.,	)	
	)	
Alleged Debtor.	)	
	)	
	)	
In re:	)	Chapter 11
	)	
SERVICIOS Y MANTENIMIENTO DEL	)	Case No. 23-10401 (LGB)
FUTURO EN TELEVISIÓN, S.A. DE C.V.,	)	
	)	
Alleged Debtor.	)	
	)	
	)	

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In re:	)	Chapter 11
	)	
CORPORACIÓN DE ASESORÍA TÉCNICA	)	Case No. 23-10394 (LGB)
Y DE PRODUCCIÓN, S.A. DE C.V.,	)	
	)	
Alleged Debtor.	)	
	)	

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In re:	)	Chapter 11
	)	
EDITORIAL MANDARINA, S.A. DE C.V.,	)	Case No. 23-10396 (LGB)
	)	
Alleged Debtor.	)	
	)	
	)	

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In re:	)	Chapter 11
	)	
MULTIMEDIA, ESPECTÁCULOS Y	)	Case No. 23-10398 (LGB)
ATRACCIONES, S.A. DE C.V.,	)	
	)	
Alleged Debtor.	)	
	)	

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In re:	)	Chapter 11
	)	
SERVICIOS FORÁNEOS DE	)	Case No. 23-10409 (LGB)
ADMINISTRACIÓN, S.A. DE C.V.,	)	
	)	
Alleged Debtor.	)	
	)	

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In re:	)	Chapter 11
	)	
SERVICIOS LOCALES DE PRODUCCIÓN,	)	Case No. 23-10410 (LGB)
S.A. DE C.V.,	)	
	)	
Alleged Debtor.	)	
	)	

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In re:	)	Chapter 11
	)	
AZTECA INTERNATIONAL	)	Case No. 23-10392 (LGB)
CORPORATION;	)	
	)	
Alleged Debtor.	)	
	)	

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In re:	)	Chapter 11
	)	
STATIONS GROUP, LLC;	)	Case No. 23-10406 (LGB)
	)	
Alleged Debtor.	)	
	)	
	)	

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In re:	)	Chapter 11
	)	
TV AZTECA HONDURAS, S.A. DE C.V.,	)	Case No. 23-10403 (LGB)
	)	
Alleged Debtor.	)	
	)	
	)	

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In re:	)	Chapter 11
	)	
COMERCIALIZADORA DE TELEVISIÓN	)	Case No. 23-10411 (LGB)
DE HONDURAS, S.A. DE C.V.,	)	
	)	
Alleged Debtor.	)	
	)	

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In re:	)	Chapter 11
	)	
INCOTEL S.A.,	)	Case No. 23-10412 (LGB)
	)	
Alleged Debtor.	)	
	)	
	)	

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In re:	)	Chapter 11
	)	
TVA GUATEMALA S.A.,	)	Case No. 23-10413 (LGB)
	)	
Alleged Debtor.	)	
	)	
	)	

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In re:	)	Chapter 11
LASIMEX, S.A. DE C.V.	)	
Alleged Debtor.	)	Case No. 23-10414 (LGB)
	)	
	)	
	)	
	)	
In re:	)	Chapter 11
TV AZTECA GLOBAL, S.L.U.,	)	
Alleged Debtor.	)	Case No. 23-10417 (LGB)
	)	
	)	
	)	
In re:	)	Chapter 11
AZTECA COMUNICACIONES PERÚ,	)	
S.A.C.,	)	Case No. 23-10416 (LGB)
Alleged Debtor.	)	
	)	
	)	
In re:	)	Chapter 11
REDES OPTICAS, S.A.C.,	)	
Alleged Debtor.	)	Case No. 23-10418 (LGB)
	)	
	)	
	)	
In re:	)	Chapter 11
TELEVISORA DEL VALLE DE MÉXICO,	)	
S.A. DE C.V.,	)	Case No. 23-10415 (LGB)
Alleged Debtor.	)	
	)	
	)	

**PETITIONING CREDITORS' MOTION FOR ENTRY OF  
AN ORDER (I) DIRECTING JOINT ADMINISTRATION OF  
CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF**

Plenisfer Investments SICAV - Destination Value Total Return, Cyrus Opportunities  
Master Fund II, Ltd., and Sandpiper Limited (the "Petitioning Creditors"), creditors of TV Azteca,

S.A.B. de C.V. and its affiliated debtors, as debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned involuntary chapter 11 cases (the “Chapter 11 Cases”), respectfully state as follows in support of this motion (the “Motion”):

**RELIEF REQUESTED**

1. By this Motion, the Petitioning Creditors seek entry of an order, substantially in the form annexed hereto as **Exhibit A** (the “Order”): (i) directing the procedural consolidation and joint administration of these Chapter 11 Cases and (ii) granting related relief. Specifically, the Petitioning Creditors respectfully request that the United States Bankruptcy Court for the Southern District of New York (the “Court”) maintain one file and one docket for all of the jointly administered Chapter 11 Cases under the case number assigned to TV Azteca, S.A.B. de C.V., and that the Chapter 11 Cases be administered under the following consolidated caption:

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	)	Chapter 11
	)	
TV AZTECA, S.A.B. DE C.V., <i>et al.</i> ,	)	Case No. 23-10385 (LGB)
	)	
Alleged Debtors.	)	(Jointly Administered)
	)	
	)	

<sup>1</sup> The Debtors in these cases are TV Azteca, S.A.B. de C.V.; Alta Empresa, S.A. de C.V.; Asesoría Especializada En Aviación, S.A. de C.V.; Equipo de Futbol Mazatlan, S.A. de C.V.; Producciones Dopamina, S.A. de C.V.; Azteca Records, S.A. de C.V.; Ganador Azteca, S.A.P.I. de C.V.; Operadora Mexicana De Televisión, S.A. de C.V.; Azteca Sports Rights LLC; Producciones Azteca Digital, S.A. de C.V.; Producciones Especializadas, S.A. de C.V.; Productora De Televisión Regional De Tv Azteca, S.A. de C.V.; Promotora de Futbol Rojinegros, S.A. de C.V.; Mazatlan Promotora de Futbol, S.A. de C.V.; Publicidad Especializada en Medios de Comunicación de TV Azteca, S.A. de C.V.; S.C.I. de México, S.A. de C.V.; Servicios Aéreos Noticiosos, S.A. de C.V.; Servicios Especializados Taz, S.A. de C.V.; Servicios y Mantenimiento del Futuro en Televisión, S.A. de C.V.; Corporación de Asesoría Técnica y de Producción, S.A. de C.V.; Editorial Mandarina, S.A. de C.V.; Multimedia, Espectáculos y Atracciones, S.A. de C.V.; Servicios Foráneos de Administración, S.A. de C.V.; Servicios Locales De Producción, S.A. de C.V.; Azteca International Corporation; Stations Group, LLC; TV Azteca Honduras, S.A. de C.V.; Comercializadora de Televisión de Honduras, S.A. de C.V.; Incotel S.A.; TVA Guatemala S.A.; Lasimex, S.A. de C.V.; TV Azteca Global, S.L.U.; Azteca Comunicaciones Perú, S.A.C.; Redes Opticas, S.A.C; Televisora del Valle de México, S.A. de C.V. The location of the Debtors’ corporate headquarters is Periférico Sur 4121, colonia Fuentes del Pedregal, alcaldía Tlalpan, C.P. 14140, Ciudad de México, México.

2. The Petitioning Creditors further request that the Court waive the requirements set forth in section 342(c)(1) of title 11 of the United States Code (the “Bankruptcy Code”) and Rules 1005 and 2002(n) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and order that the foregoing caption satisfies all applicable requirements.

3. The Petitioning Creditors request that a docket entry, substantially similar to the following, be entered on the docket of each of the Chapter 11 Cases, other than that of TV Azteca, S.A.B. de C.V., to reflect the joint administration of these Chapter 11 Cases:

An order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of TV Azteca, S.A.B. de C.V. (Case No. 23- 10385 (LGB)); Alta Empresa, S.A. de C.V. (Case No. 23-10386 (LGB)); Asesoría Especializada En Aviación, S.A. de C.V. (Case No. 23-10387 (LGB)); Equipo de Futbol Mazatlan, S.A. de C.V. (Case No. 23-10388(LGB)); Azteca Records, S.A. de C.V. (Case No. 23-10390 (LGB)); Ganador Azteca, S.A.P.I. de C.V. (Case No. 23-10391 (LGB)); Operadora Mexicana De Televisión, S.A. de C.V. (Case No. 23-10393 (LGB)); Producciones Azteca Digital, S.A. de C.V. (Case No. 23-10397 (LGB)); Producciones Especializadas, S.A. de C.V. (Case No. 23-10399 (LGB)); Productora De Televisión Regional De Tv Azteca, S.A. de C.V. (Case No. 23-10400 (LGB)); Promotora de Futbol Rojinegros, S.A. de C.V. (Case No. 23-10402 (LGB)); Publicidad Especializada en Medios de Comunicación de TV Azteca, S.A. de C.V. (Case No. 23-10405 (LGB)); S.C.I. de México, S.A. de C.V. (Case No. 23-10407 (LGB)); Servicios Aéreos Noticiosos, S.A. de C.V. (Case No. 23-10408 (LGB)); Servicios Especializados Taz, S.A. de C.V. (Case No. 23-10419 (LGB)); Servicios y Mantenimiento del Futuro en Televisión, S.A. de C.V. (Case No. 23-10401 (LGB)); Corporación de Asesoría Técnica y de Producción, S.A. de C.V. (Case No. 23-10394 (LGB)); Editorial Mandarina, S.A. de C.V. (Case No. 23-10396 (LGB)); Multimedia, Espectáculos y Atracciones, S.A. de C.V. (Case No. . 23-10398 (LGB)); Servicios Foráneos de Administración, S.A. de C.V. (Case No. 23-10409 (LGB)); Servicios Locales De Producción, S.A. de C.V. (Case No. 23-10410 (LGB)); Azteca International Corporation; (Case No. 23-10392 (LGB)); Stations Group, LLC (Case No. 23-10406 (LGB)); TV Azteca Honduras, S.A. de C.V. (Case No. 23-10403 (LGB)); Comercializadora de Televisión de Honduras, S.A. de C.V. (Case No. 23-10411 (LGB)); Incotel S.A. (Case No. Case No. 23-10412 (LGB)); TVA Guatemala S.A. (Case No. No. 23-10413 (LGB)); Lasimex, S.A. de C.V. (Case No. 23-10414 (LGB)); TV Azteca Global, S.L.U. (Case No. 23-10417 (LGB)); Azteca Comunicaciones Perú, S.A.C. (Case No. 23-10416 (LGB)); Redes Opticas, S.A.C. (Case No. 23-10418 (LGB)); Televisora del Valle de México, S.A. de C.V. (Case No. 23-10415 (LGB)). All further pleadings and other papers shall be filed, and all further docket entries shall be made, in Case No. 23-10385 (LGB).

### **JURISDICTION AND VENUE**

4. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the Southern District of New York, dated as of January 31, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The statutory bases for the relief requested herein are Bankruptcy Code section 105(a) and Bankruptcy Rule 1015(b).

6. The Petitioning Creditors consent to the entry of a final order by this Court in connection with this Motion to the extent that it is later determined that this Court, absent consent of the parties, cannot enter final orders or judgments in connection with this Motion consistent with Article III of the United States Constitution.

### **BACKGROUND**

7. On March 20, 2023 (the “Petition Date”), the Petitioning Creditors filed an involuntary petition for relief against each Debtor in this Court under chapter 11 of the Bankruptcy Code.

8. General factual background regarding the Debtors and certain events leading up to the commencement of these Chapter 11 Cases are set forth in greater detail in the *Statement of the Petitioning Creditors in Support of the Involuntary Chapter 11 Petitions Against TV Azteca and Its Debtor Affiliates*, filed substantially contemporaneously herewith and incorporated herein by reference.

### **BASIS FOR RELIEF**

#### **A. Procedural Consolidation and Joint Administration of These Chapter 11 Cases is Appropriate**

9. Bankruptcy Rule 1015(b) provides, in relevant part, that if “two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.” Fed. R. Bankr. P. 1015(b). Bankruptcy Code section 101(2) defines the term “affiliate” in pertinent part, as:

(A)[an] entity that directly or indirectly owns, controls, or holds with power to vote, 20 percent or more of the outstanding voting securities of the debtor . . . [or]

(B) [a] corporation 20 percent or more of whose outstanding voting securities are directly or indirectly owned, controlled, or held with power to vote, by the debtor, or by an entity that directly or indirectly owns, controls, or holds with power to vote, 20 percent or more of the outstanding voting securities of the debtor. . . .

11 U.S.C. § 101(2).

10. The Debtors in these Chapter 11 Cases are TV Azteca, S.A.B. de C.V. and thirty four (34) of its direct and indirect subsidiaries. TV Azteca, S.A.B. de C.V. is the ultimate parent of each of the other Debtors and, therefore, all of the Debtors qualify as “affiliates” of each other under either Bankruptcy Code section 101(2)(A) or (B), as applicable. Accordingly, the Petitioning Creditors submit that the Court is authorized to grant the relief requested herein pursuant to Bankruptcy Rule 1015(b).

11. Moreover, Bankruptcy Code section 105(a), which states that a bankruptcy court “may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code],” also provides the Court with the power to order joint administration of these Chapter 11 Cases. *See* 11 U.S.C. § 105(a).

12. Joint administration of these Chapter 11 Cases will provide significant administrative convenience without harming the substantive rights of any party in interest. Indeed, many of the motions, hearings and orders in these Chapter 11 Cases will affect each of the Debtors. As such, joint administration will reduce fees and costs to the benefit of all parties in interest by avoiding duplicative filings and objections. Further, joint administration will not adversely affect the Debtors’ respective constituencies because this Motion seeks only administrative, not substantive, consolidation of the Debtors’ estates. Joint administration also will allow the Office of the United States Trustee for the Southern District of New York and all parties in interest to monitor these Chapter 11 Cases with greater ease and efficiency.

13. Accordingly, the Petitioning Creditors submit that the joint administration of these Chapter 11 Cases is in the best interests of the Debtors' estates, their creditors and all other parties in interest and respectfully request that the Court direct (a) the procedural consolidation and joint administration of these Chapter 11 Cases and (b) that a notation substantially similar to the notation provided in paragraph 3 above be entered on the docket of each of the Debtors' cases (other than that of TV Azteca, S.A.B. de C.V. ) to reflect the joint administration of these Chapter 11 Cases.

**B. The Case Caption Satisfies All Applicable Requirements**

14. The Petitioning Creditors seek to waive the requirements of Bankruptcy Code section 342(c)(1) and Bankruptcy Rules 1005 and 2002(n) that the case caption on pleadings and notices in these Chapter 11 Cases contain the name and address of each Debtor. As an alternative to including this information in the caption, the Petitioning Creditors propose to include, in a footnote on the first page of each pleading and notice, a list of each of the Debtors in these Chapter 11 Cases and the Debtors' corporate headquarters. Given the number of Debtors in these Chapter 11 Cases, a simplified caption is particularly appropriate in these Chapter 11 Cases. Further, the case-specific information that the Petitioning Creditors propose be omitted from the case caption is provided in each petition, which are publicly available. Therefore, the Petitioning Creditors submit that the policies behind the requirements of Bankruptcy Code section 342(c)(1) and Bankruptcy Rules 1005 and 2002(n) have been satisfied and respectfully request that the Court order that the case caption satisfies all applicable requirements.

**NOTICE**

15. Notice of this Motion will be provided to: (a) the Debtors; (b) counsel to the Debtors; (c) the Office of the United States Trustee for the Southern District of New York; (d) the Internal Revenue Service; and (d) any party that has requested notice pursuant to Bankruptcy Rule 2002. Notice of this Motion and any order entered hereon will be served in accordance with

Bankruptcy Rule 9013. In light of the nature of the relief requested herein, the Petitioning Creditors respectfully submit that no other or further notice is necessary.

**WHEREFORE**, the Petitioning Creditors respectfully request entry of the Order substantially in the form annexed hereto as **Exhibit A**, granting the relief requested in this Motion and such further relief as is just, proper and equitable.

Dated: March 27, 2023  
New York, New York

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